

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

Dawn Curry Page, et al,

Plaintiffs,

v.

Virginia State Board of Elections, et al,

Defendants,

Civil Action No. 3:13-cv-678-REP-LO-AKD

**PLAINTIFFS' AND DEFENDANTS' JOINT STATUS REPORT AND PROPOSED  
SCHEDULE**

Pursuant to the Court's oral instruction at the January 28, 2014 status conference, counsel for Plaintiffs Dawn Curry Page, Gloria Personhuballah, and James Farkas; Defendants Charlie Judd, Kimberly Bowers, and Don Palmer; and Intervenor-Defendants Congressmen Eric Cantor, Robert Wittman, Bob Goodlatte, Frank R. Wolf, Randy Forbes, Morgan Griffith, Scott Rigell, and Robert Hurt have conferred and propose the following deadlines in preparation for the trial in this matter scheduled for May 20 through May 22, 2014:

- **Expert Disclosures:** Plaintiffs will serve a supplemental expert report related to their proposed Alternative Congressional Map by February 21, 2014. Defendants shall serve any supplemental expert rebuttal report relating to Plaintiffs' Alternative Congressional Map by March 14, 2014. Plaintiffs shall serve any supplemental expert reply report relating to their Alternative Congressional Map by March 24, 2014.
- **Discovery Deadline:** The parties, including the Intervenor-Defendants, consent to and incorporate the discovery limitations set forth in Paragraph 5 of the Joint Status Report and Discovery Plan filed on November 25, 2013, specifically that (1) all

written discovery shall be subject to an expedited, 10-day deadline for objections and a 15-day response deadline to include a privilege log for responses to document requests; (2) each party or intervenor may serve on any other party or intervenor no more than 15 interrogatories; (3) each party or intervenor may serve on any other party or intervenor no more than 15 requests for production or other document requests; (4) each party may take no more than 5 depositions; and (5) each deposition shall last no longer than one seven-hour day. Any interrogatories or requests for production already served count against the serving party's limit. In light of the recent scheduling developments in the case, including specifically the setting of trial for May 20, 2014, the parties revise the formerly established discovery deadline. Discovery will now conclude by March 31, 2014. Because of scheduling conflicts of the parties' experts, however, this discovery deadline does not apply to expert depositions. The parties shall be permitted to take expert depositions before or after the discovery deadline on mutually agreeable dates.

- **Witness, Exhibit, and Deposition Designations:** The parties will exchange witness lists, short summaries of each witness' testimony, exhibit lists, copies of exhibits, and deposition designations by April 7, 2014. Any objections to these materials will be served by April 11, 2014, at which point the parties will attempt to resolve any disputes.
- **Trial Briefs:** The parties will file trial briefs by April 16, 2014.
- **Motions in Limine:** The parties will file any motions in limine by April 25, 2014.

Respectfully submitted,

Dated: February 7, 2014

By /s/ (by JKR with permission)

Mike Melis  
Office of the Attorney General  
900 East Main Street  
Richmond, Virginia 23219  
(804) 786-2071  
Fax: (804) 786-1991  
mmelis@oag.state.va.us

*Attorneys for Defendants Charlie Judd,  
Kimberly Bowers, and Don Palmer in their  
official capacities*

By /s/

John K. Roche (VSB# 68594)  
Marc Erik Elias (admitted *pro hac vice*)  
John Devaney (admitted *pro hac vice*)  
Perkins Coie, LLP  
700 13th St. N.W., Suite 600  
Washington, D.C. 20005-3960  
Phone: (202) 434-1627  
Fax: (202) 654-9106  
Email: JRoche@perkinscoie.com  
Email: MElias@perkinscoie.com  
Email: JDevaney@perkinscoie.com

By /s/ (by JKR with permission)

Jonathan Andrew Berry  
Jones Day  
51 Louisiana Ave NW  
Washington, DC 20001  
202-879-3939  
Fax: 202-626-1700  
jberry@jonesday.com

John Matthew Gore  
Jones Day  
51 Louisiana Ave NW  
Washington, DC 20001  
(202) 879-3930  
Fax: (202) 626-1700  
jmgore@jonesday.com

Michael Anthony Carvin  
Jones Day  
51 Louisiana Ave NW  
Washington, DC 20001  
(202) 879-3939  
macarvin@jonesday.com

*Attorneys for Intervenor-Defendant Virginia  
Representatives*

Kevin J. Hamilton (admitted *pro hac vice*)  
Perkins Coie, LLP  
1201 Third Avenue, Ste. 4800  
Seattle, WA 98101-3099  
Phone: (206) 359-8000  
Fax: (206) 359-9000  
Email: KHamilton@perkinscoie.com

*Attorneys for Plaintiffs*

# CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February, 2014, I caused the foregoing to be electronically filed with the Clerk of this Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Mike Melis  
Office of the Attorney General  
900 East Main Street  
Richmond, Virginia 23219  
(804) 786-2071  
Fax: (804) 786-1991  
mmelis@oag.state.va.us

*Attorneys for Defendants Charlie Judd,  
Kimberly Bowers, and Don Palmer in their  
official capacities*

Jonathan Andrew Berry  
Jones Day  
51 Louisiana Ave NW  
Washington, DC 20001  
202-879-3939  
Fax: 202-626-1700  
jberry@jonesday.com

John Matthew Gore  
Jones Day  
51 Louisiana Ave NW  
Washington, DC 20001  
(202) 879-3930  
Fax: (202) 626-1700  
jmgore@jonesday.com

Michael Anthony Carvin  
Jones Day  
51 Louisiana Ave NW  
Washington, DC 20001  
(202) 879-3939  
macarvin@jonesday.com

*Attorneys for Intervenor-Defendant Virginia  
Representatives*

Respectfully submitted,

By \_\_\_\_\_ /s/  
John K. Roche (VA Bar No. 68594)  
Perkins Coie, LLP  
700 13th St., N.W., Suite 600  
Washington, D.C. 20005-3960  
Phone: (202) 434-1627  
Fax: (202) 654-9106  
JRoche@perkinscoie.com

*Attorneys for Plaintiffs*